IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

)	
STEPHANIE DIPIERRO,)	
)	
Plaintiff,)	
)	
V.)	
)	
HUGH J. HURWITZ, in his official)	C.A. No. 1:19-cv-10495-WGY
capacity as Acting Director of the)	
Federal Bureau of Prisons, and)	
DR. DEBORAH G. SCHULT, in her)	
official capacity as Assistant Director)	
of the Health Services Division of the)	
Federal Bureau of Prisons,)	
)	
Defendants.)	
)	

NOTICE OF SETTLEMENT AND JOINT MOTION TO DISMISS

Pursuant to Fed. R. Civ. P. 41(a)(2), Plaintiff Stephanie DiPierro and Defendants Hugh J. Hurwitz, Acting Director of the Federal Bureau of Prisons and Dr. Deborah G. Schult, Assistant Director of the Health Services Division of the Federal Bureau of Prisons (collectively, "Defendants"), hereby provide notice of settlement and move to dismiss this action as to the Defendants without prejudice, on the condition that the Court retain jurisdiction to enforce the agreement, if necessary.

WHEREFORE the parties request the following:

- 1. That the Court retain jurisdiction to enforce the settlement agreement, if necessary; and
- 2. Should the above provision be acceptable, that the Court dismiss the Complaint without prejudice.

Dated: June 7, 2019

ANDREW E. LELLING, United States Attorney

By: /s/ Rayford A. Farquhar
Rayford A. Farquhar (BBO#560350)
Assistant U.S. Attorney
U.S. Attorney's Office
One Courthouse Way
Boston, MA 02210
(617) 748-3100
Rayford.farquhar@usdoj.gov

Respectfully submitted,

STEPHANIE DIPIERRO

By: /s/ Robert Frederickson III
Robert Frederickson III (BBO 670111)
Marielle Sanchez (BBO 703897)
GOODWIN PROCTER LLP
100 Northern Avenue
Boston, Massachusetts 02210
Tel.: 617.570.1000
Fax: 617.523.1231
RFrederickson@goodwinlaw.com

Ira J. Levy (*Pro hac vice*)
Alexandra D. Valenti (*Pro hac vice*)
Tiffany Mahmood (*Pro hac vice*)
Christine Armellino (*Pro hac vice*)
GOODWIN PROCTER LLP
The New York Times Building
620 Eight Avenue
New York, NY 10018
Tel.: 212.813.8800
Fax: 212.355.3333
ILevy@goodwinlaw.com
AValenti@goodwinlaw.com

MSanchez@goodwinlaw.com

ILevy@goodwinlaw.com AValenti@goodwinlaw.com TMahmood@goodwinlaw.com CArmellino@goodwinlaw.com

Matthew R. Segal (BBO 654489)
Jessie J. Rossman (BBO 670685)
American Civil Liberties Union
Foundation of Massachusetts, Inc.
211 Congress Street
Boston, MA 02110
Tel.: 617.482.3170
msegal@aclum.org
jrossman@aclum.org
Attorneys for Plaintiff Stephanie DiPierro

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 7, 2019.

/s/ Robert Frederickson III
Robert Frederickson III

LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that I have conferred with defendants' counsel in this matter and he has agreed to join this motion.

Dated: June 7, 2019 /s/ Jessie J. Rossman

/s/ Jessie J. Rossman J. Rossman (BBO No. 670685)